

## **EXHIBIT 6**

9/18/2014

Susan Galli

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION

4 LINCOLN JONES, JR., ET AL., )  
5 Plaintiffs, ) Civil Action No.  
6 VS ) CV-13-02390 LHK PSG  
7 TRAVELERS CASUALTY INSURANCE )  
8 COMPANY OF AMERICA, )  
9 Defendant. )

10  
11 DEPOSITION OF: Susan Galli  
12 DATE: September 18, 2014  
13 HELD AT: Day Pitney LLP  
14 242 Trumbull Street  
15 Hartford, Connecticut

16  
17  
18  
19  
20 Reporter: Robin Balletto, RPR, LSR #230  
21 BRANDON HUSEBY REPORTING & VIDEO  
22 249 Pearl Street  
23 Hartford, Connecticut 06106  
24 (860) 549-1850  
25

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1 get going, and without any disrespect at all to Judge  
2 Grewal, we thought we would try to make the most of the  
3 day.

4 MR. BRANCART: And I will say to make  
5 the most of the day we've made efforts to contact  
6 defense counsel. I know that Mr. Peterson is here in  
7 Hartford, but he is unable to -- was unable to come and  
8 appear, and therefore, we weren't able to obtain per  
9 the order a California, or I should say a Northern  
10 District of California attorney to start, but here we  
11 are now.

12

13 DIRECT EXAMINATION BY MR. BRANCART

14

15 Q Ms. Galli, would you please state for me your  
16 full name?

17 A Susan Galli, G-A-L-L-I.

18 Q Have you ever gone by any other names during  
19 the period of time you've worked at Travelers?

20 A No.

21 Q Do you commonly use the first name of Sue in  
22 your correspondence or work at Travelers?

23 A Yes.

24 Q Would you please state your current business  
25 address?

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1 Q And the recommendation was to maintain that  
2 wording of that ineligible operation, correct?

3 A Yes.

4 Q Have there been -- you indicate that the  
5 final report has not been written. Have there been  
6 drafts of the report?

7 A There have been Power Point presentations.

8 Q Within the 2013 CURE team, was there any one  
9 member that was assigned to ineligible operations?

10 A No.

11 Q Was there any one member who took a lead in  
12 addressing or reviewing the ineligible operation known  
13 as public housing by shorthand?

14 A No.

15 Q Were alternatives considered as part of the  
16 2013 CURE process for modifying the IO for public  
17 housing?

18 A Can you repeat the question?

19 MR. CURNIN: Yes, objection.

20 BY MR. BRANCART:

21 Q Sure. My question is, were there proposals  
22 considered for modifying the public housing IO  
23 language?

24 A No.

25 Q Were there any reports that were reviewed in

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1 connection with consideration of the IO language done  
2 with public housing?

3 A No.

4 Q Was there any data that was considered, by  
5 which I mean data computations of prevalence, risks,  
6 things of that kind associated with the review of the  
7 IO public housing, I'm sorry, the public housing  
8 ineligible operation --

9 A No.

10 Q -- as part of the 2013 CURE?

11 A No.

12 Q Did anyone make any proposals about modifying  
13 the public housing IO language?

14 A No.

15 Q Was there any discussion in the 2013 CURE  
16 about modifying or changing the manner in which  
17 Travelers employees are trained on ineligible  
18 operations?

19 A No.

20 Q Was there any recommendation made about  
21 changing the way independent agents are trained about  
22 the application of ineligible operations?

23 A No.

24 Q Regarding Apartment Pac, were there  
25 recommendations that were made to change any of the

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1 A Yes.

2 Q In layman's terms what does that mean?

3 A The chances of having a claim.

4 Q There is also the terms used which are loss  
5 claims, I'm sorry, claims loss. Have you heard that  
6 term used?

7 A Not that I can recall.

8 Q Would you please identify for me what you  
9 understand to be the best practices to reduce the risk  
10 of loss in the operation of an apartment building?

11 MR. CURNIN: Objection.

12 A Can you be a little more specific?

13 BY MR. BRANCART:

14 Q Sure. The manner in which an apartment is  
15 operated, or the nature of its structure or condition  
16 can create risk, true?

17 A Yes.

18 Q Risk can be reduced by the manner, by  
19 observing practices, certain practices, good practices,  
20 true?

21 A Yes.

22 Q And also by having certain conditions exist,  
23 or certain defects not exist, true?

24 A Yes.

25 Q Would you list for me, then, your

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1 understanding of what are the best practices in  
2 connection with the operation of an apartment complex  
3 that would reduce the risk of loss?

4 A Having a full-time property manager, having a  
5 resident manager on place, having a regular maintenance  
6 program, making sure that all the buildings met life  
7 safety requirements, having an owner that is proactive  
8 versus reactive.

9 Q Anything else?

10 A That's all I can think of right now.

11 Q Best practices would also include having an  
12 appropriate amount of living space, true?

13 A I'm not sure what you mean by living space.

14 Q So there's not overcrowding.

15 A Yes.

16 Q Security?

17 A Yes.

18 Q Sound structure and materials?

19 A Yes.

20 Q Clean and adequate water supply?

21 A Yes.

22 Q Elimination or control or disclosure of lead  
23 paint?

24 A Yes.

25 Q Smoke detectors?

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1 A Yes.

2 Q Maintenance of sanitary conditions?

3 A Yes.

4 Q Unimpeded access?

5 A Yes.

6 Q Adequate heating and cooling controls?

7 A Yes.

8 Q Adequate illumination?

9 A Yes.

10 Q Best practices would include requiring  
11 residents of the apartment building to maintain, or I  
12 should say not violate any of those housing quality  
13 standards, true?

14 A Yes.

15 Q Best practices would also include requiring  
16 that the owner maintain the property to maintain those  
17 quality housing standards, true?

18 A Yes.

19 (Plaintiffs' Exhibit 211,  
20 Premises Liability Supplement General Liability  
21 Underwriting Information: Marked for Identification.)

22 BY MR. BRANCART:

23 Q Let me show you what I'll mark as  
24 Exhibit 211. 211 is a form, it's a premises liability  
25 supplement, general liability underwriting information.



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## JURAT

I, SUSAN GALLI, do hereby certify that the foregoing testimony taken on September 18, 2014, is true and accurate, including any corrections noted on the corrections page, to the best of my knowledge and belief.

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SUSAN GALLI

At \_\_\_\_\_ in said county of \_\_\_\_\_,  
this \_\_\_\_\_ day of \_\_\_\_\_, 2014, personally  
appeared SUSAN GALLI, and she made oath to the truth of  
the foregoing corrections by her subscribed.

Before me, \_\_\_\_\_, Notary Public

My commission expires:

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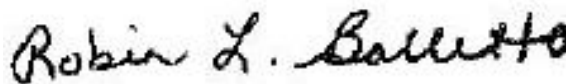
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## 1 CERTIFICATE OF REPORTER

2 I, Robin Balletto, a Registered Professional  
3 Reporter/Notary Public within and for the State of  
4 Connecticut, do hereby certify there came before me, on  
5 the 18th day of September, 2014, the following named  
6 person, to wit: SUSAN GALLI, who was by me duly sworn  
7 to testify to the truth and nothing but the truth; that  
8 she was thereupon carefully examined upon her oath and  
9 her examination reduced to writing under my  
10 supervision; that this deposition is a true record of  
11 the testimony given by the witness.

12 I further certify that I am neither counsel for,  
13 related to, nor employed by any of the parties to the  
14 action in which this deposition is taken; and further,  
15 that I am not a relative or employee of any attorney or  
16 counsel employed by the parties hereto, nor financially  
17 or otherwise interested in the outcome of the action.

18 WITNESS my hand and affixed my seal this 27th day  
19 of September, 2014.

20 

21 \_\_\_\_\_  
22 Robin Balletto, RPR

23 My commission expires: October 31, 2018  
24  
25